

EVIDENTIARY SUBMISSION EXHIBIT C

[REDACTED]

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
WESTERN DIVISION**

JANE DOE #1 on behalf of herself)	
and all others similarly situated,)	
)	
Plaintiff,)	
)	
vs.)	
)	Civil Action No.
MG FREESITES, LTD, d/b/a)	
“PORNHUB”; MG FREESITES II,)	7:21-CV-00220-LSC
LTD; MINDGEEK S.A.R.L.;)	
MINDGEEK USA)	
INCORPORATED; MG CY)	
HOLDINGS LTD; MINDGEEK)	
CONTENT RT LIMITED; 9219-)	
1568 QUEBEC INC., d/b/a)	
MINDGEEK; and MG BILLING)	
LTD,)	
)	
Defendants.)	

DECLARATION OF [REDACTED]

I, [REDACTED], declare as follows:

1. I submit this declaration in support of Defendants’ Motion for Summary Judgment. I have personal knowledge of the facts stated herein, and if called as a witness, I could and would competently testify thereto.

2. I am employed by Aylo Global Entertainment Inc., formerly known as MG Global Entertainment Inc., [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3. [REDACTED]

[REDACTED] “NCMEC is the nation’s largest and most influential child protection organization.”¹ NCMEC “is a private, non-profit 501(c)(3) corporation whose mission is to help find missing children, reduce child sexual exploitation, and prevent child victimization.”² “NCMEC works with families, victims, private industry, law enforcement, and the public to assist with preventing child abductions, recovering missing children, and providing services to deter and combat child sexual exploitation.”³

4. “NCMEC works closely with technology industry partners,” including MindGeek, “to help reduce child sexual abuse material that circulates on the internet and stop the harassing online comments being posted as a result of this material.”⁴ NCMEC also provides the public and electronic service providers (ESPs) with

¹ <https://www.missingkids.org/home>.

² <https://www.missingkids.org/footer/about>.

³ *Id.*

⁴ <https://www.missingkids.org/gethelpnow/csam-resources>.

“resources, guidance, and tools to help ... remove child sexual exploitation photos and videos from the internet.”⁵ And NCMEC operates a CyberTipline—“the nation’s centralized reporting system for the online exploitation of children.”⁶ The public and ESPs can use the CyberTipline to, among other things, report suspected CSAM.⁷

5. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6. [REDACTED], I received extensive training on how to identify CSAM and report it to the relevant authorities. For example, while working as [REDACTED] [REDACTED], I would process reports of potential CSAM, which involved reviewing and analyzing the content and information provided with the report, and providing that information to law enforcement. [REDACTED] [REDACTED], I also gained exposure to industry-trusted tools that are used to

⁵ *Id.*

⁶ <https://www.missingkids.org/gethelpnow/cybertipline>.

⁷ *Id.*

detect suspected CSAM, such as tools that use hash matching to compare content against a database of known CSAM content.

7. With my extensive experience [REDACTED] and recognizing that MindGeek was a standard bearer in moderation in the online adult entertainment industry, I began working at MG Global Entertainment Inc. in [REDACTED].

8. Based on my work at both [REDACTED] and MindGeek, I am familiar with MindGeek's content moderation practices for Pornhub.com, Redtube.com, Youporn.com, and other MindGeek video sharing websites, including MindGeek's content moderation practices for screening and removing potential and apparent CSAM.

9. Since at least 2009, MindGeek has proactively and voluntarily devoted millions of dollars to screening for and removing potential CSAM. MindGeek has consistently added to its portfolio of technological tools and improved its human-moderation techniques so as to advance the accurate and prompt detection and removal of CSAM from its platforms.

10. Attached as **Exhibit 1** is a true and correct list of [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]. Some of the initiatives reflected in Exhibit 1 are discussed in more detail below.

11.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

12.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

14.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

15.

[REDACTED]

[REDACTED]

16.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

17.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

18. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

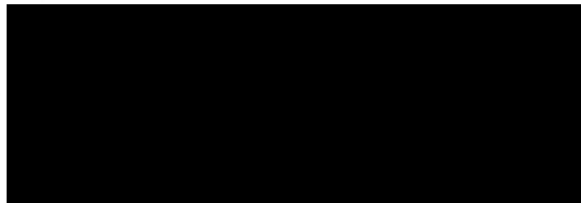
[REDACTED] The Take It Down program is a free service that can help persons remove and stop the online sharing of nude, partially nude, or sexually explicit images taken of them when they were under 18 years old.⁹

[Signature on following page]

⁸ See <https://takeitdown.ncmec.org/participants/>.

⁹ <https://takeitdown.ncmec.org/>.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration is executed on September 5, 2024.



**EXHIBIT 1 TO EVIDENTIARY
SUBMISSION EXHIBIT C**

[FILED ENTIRELY UNDER SEAL]